

Exhibit 2

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Mr. Joseph D. Brown, United States Attorney
Eastern District of Texas
One Grand Centre
600 East Taylor Street, Suite 2000
Sherman, Texas 75090

Via facsimile
(903) 892-2792 and (972) 509-1209

Re: *Edward Butowsky v. David Folkenflik, et al.*, Case No. 4:18-cv-00442-ALM (E.D. Tex.) and *Edward Butowsky v. Michael Gottlieb, et al.*, Case No. 4:19-cv-00180-ALM-KPJ (E.D. Tex.)

Mr. Brown:

I represent Edward Butowsky in both of the cases identified above, and I have attached two subpoenas that will likely be served next week. Pursuant to *United States ex rel. Touhy v. Ragen*, 340 U.S. 462 (1951), I write to request that the Federal Bureau of Investigation release the items and things requested in the subpoenas duces tecum.

The requested items and things are directly relevant to the claims in both cases, as well as a third case pending against Mr. Butowsky in the District of the District of Columbia.

Thank you for your attention to these matters.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ty Clevenger', with a stylized flourish extending from the end.

Ty Clevenger